

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:19-CR-760
	:	
Plaintiff,	:	
	:	
	:	JUDGE DAN A. POLSTER
vs.	:	
	:	
LAURA L. SMITH,	:	<u>DEFENDANT’S UNOPPOSED</u>
	:	<u>MOTION TO CONTINUE PRETRIAL,</u>
Defendant,	:	<u>TRIAL AND ALL RELATED</u>
	:	<u>DEADLINES</u>
	:	

Now comes Laura L. Smith, through counsel, and respectfully moves this Court for an Order continuing the motion deadline, pretrial conference, and trial dates in this case for a period of approximately 90 days from the current pretrial date of February 4, 2020, pursuant to 18 U.S.C. § 3161(h)(7)(A). Defense counsel has discussed this matter with Assistant United States Attorney Brian McDonough, who provided that the government has no objection to this motion.

Counsel submits this extended continuance is due to the fact that Ms. Smith is pregnant with her first child, and her tentative due date is February 9, 2020. Ms. Smith has had a difficult pregnancy with significant health concerns, and she has been periodically hospitalized throughout the pregnancy. After the delivery of her child, Ms. Smith will need a period of time after the birth to make the necessary bonds with her newborn, and recover her health after delivery.

In addition to the time needed for Ms. Smith due to her pregnancy and the impending birth of her child, counsel will need time to review the discovery, which contains many recordings, confer with Ms. Smith regarding the discovery, complete investigations, and consider a plea offer or prepare for trial. There is a significant amount of investigation and review of the discovery, which was recently received by defense counsel on January 24, 2020, which needs to occur, and counsel also needs additional time to address the issues in this case and be able to meaningfully confer with Ms. Smith after review of the evidence and information involved with this case. This request for continuance of pretrial and trial dates is made in the interest of justice and not for needless delay, and interests of justice far outweigh the public's interest in a speedy trial in this matter, and would best be served by granting this motion. *See*, 18 U.S.C. § 3161(h)(7)(A).

Pursuant to 18 U.S.C. § 3161(h)(7)(A), Ms. Smith asks this Court to find that the ends of justice are served by the granting of this continuance, and outweigh the best interest of the public and the defendant in a speedy trial. Furthermore, counsel states that she has met with Ms. Smith and has advised her of her right to a speedy trial. Understanding her rights, Ms. Smith knowingly waives her right to a speedy trial in this matter.

Having full and complete knowledge of the foregoing factors and the specific rights and requirements provided and set forth under Section 3161, Ms. Smith hereby moves this Honorable Court for a continuance of the trial date beyond the seventy (70) day limitation set forth in Title 18, Section 3161 *et seq.*

For the reasons set forth above, defendant Laura L. Smith requests that this Court grant the motion for continuance of all pretrial and trial dates for a period of 90 days, from the date of the currently scheduled pretrial date of February 4, 2020.

Respectfully submitted,

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